

**IN THE UNITED STATE DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

ANDREA MARTINEZ,)	
)	
Plaintiff,)	
)	
v.)	Case No. 19-cv-06135-FJG
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

JOINT MOTION FOR ENTRY OF AMENDED SCHEDULING AND TRIAL ORDER

Pursuant to the Court's August 31, 2022 Order (Doc. No. 101), Plaintiff Andrea Martinez and Defendant United States of America jointly move the Court for the entry of an Amended Scheduling and Trial Order that provides that the parties should be directed to complete the following pre-trial tasks by the dates set forth below:

- a. Parties' joint status report: December 16, 2022;
- b. Plaintiff's supplemental expert reports: October 27, 2022;
- c. Close of fact discovery: December 30, 2022;
- d. Defendant's expert reports: January 17, 2023;
- e. Rebuttal expert reports, February 17, 2023;
- f. Expert challenges/Daubert motions: March 3, 2023;
- g. Close of discovery: March 10, 2023;
- h. Dispositive motions: March 31, 2023;
- i. Oppositions to dispositive motions: April 28, 2023; and
- j. Replies in support of dispositive motions: May 12, 2023.

The parties further respectfully suggest that the matter—which now raises claims only under the Federal Tort Claims Act—may be set for a bench trial by subsequent order, or, alternatively, to occur at any time after September 5, 2023.

WHEREFORE, the parties jointly pray the Order of the Court.

Date: September 14, 2022

Respectfully submitted,

/s/ Gillian R. Wilcox

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Certificate of Service

I certify that a copy of the foregoing was filing electronically on September 14, 2022, and delivered by operation of the Court's CM/ECF system to all counsel of record.

/s/ J. Emmett Logan